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YAHOO! INC.

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 AUGME TECHNOLOGIES, INC.,

15 Plaintiff,

16 v.

17 YAHOO! INC.,

18 Defendant.

19
20 YAHOO! INC.,

21 Counterclaim Plaintiff,

22 v.

23 AUGME TECHNOLOGIES, INC. and WORLD
24 TALK RADIO, LLC,

25 Counterclaim Defendants.

Case No. C-09-5386 JCS

**DECLARATION OF JOHN K.
BLAKE, JR., IN SUPPORT OF
YAHOO! INC.'S
ADMINISTRATIVE MOTION TO
SEAL PORTIONS OF THE
PARTIES' APRIL 18, 2012 JOINT
LETTER AND CERTAIN
EXHIBITS THERETO**

1 I, John K. Blake, Jr., hereby state the following:

2 1. I am an attorney licensed to practice law in the State of California and am admitted to
3 practice in this Court. I am an associate at the law firm of Morrison & Foerster LLP, counsel of
4 record for Yahoo! Inc. ("Yahoo!") in this action. Pursuant to N.D. Cal. Civil L.R. 79-5, I make
5 this declaration in support of Yahoo!'s Administrative Motion to Seal portions of the April 18,
6 2012 Joint Letter to the Court Regarding Discovery Disputes ("April 18, 2012 Joint Letter") and
7 Certain Exhibits thereto. I have personal knowledge of the matters stated in this Declaration and I
8 could and would testify competently thereto if called to do so.

9 2. The entirety of Exhibits F, L, and H and portions of Exhibit E and the April 18, 2012
10 Joint Letter contain information designated "Highly Confidential – Outside Counsel Only" or
11 "Confidential" by Yahoo! under the Stipulated Protective Order.

12 3. Exhibit F contains excerpts of the transcript of the March 13, 2012 30(b)(6)
13 deposition of David Eaton, designated by Yahoo! as Highly Confidential – Outside Counsel Only.
14 Mr. Eaton's testimony includes references to Yahoo!'s financial systems and databases that are
15 confidential, proprietary business information that could be used by Yahoo!'s competitors to its
16 disadvantage.

17 4. Exhibit L contains excerpts of the transcript of the April 5, 2012 30(b)(6) deposition
18 of Cheralyn Cofer, designated by Yahoo! as Highly Confidential – Outside Counsel Only. Ms.
19 Cofer's testimony includes references to Yahoo!'s ad serving statistical reporting systems that are
20 confidential, proprietary business information that could be used by Yahoo!'s competitors to its
21 disadvantage.

22 5. Exhibit H contains Yahoo!'s supplemental interrogatory responses designated by
23 Yahoo! as "Confidential." These responses detail Yahoo!'s ad-serving and display revenues and
24 are confidential, proprietary business information that could be used by Yahoo!'s competitors to
25 its disadvantage.

26 6. Portions of Exhibit E, an April 11, 2012 Letter from Augme to Yahoo!, describe the
27 substance of Ms. Cofer's deposition testimony on Yahoo!'s statistical databases, which, as noted
28 above, has been designated by Yahoo! as Highly Confidential – Outside Counsel Only.

